

## **REMARKS**

Upon entry of the present amendment, claims 1-4, 8-10, 14-20, and 22 will remain pending in this application. Claims 5-7, 11-13, and 21 were previously cancelled. Applicant respectfully submits that no new matter is added by the present amendment. The matter added to claims 1, 14, 17, and 22 is supported in the Specification at least at page 11, lines 19-23 and in the Drawings at least at Figure 4 (step 415).

Claim 1 stands objected to. Claims 1-4, 8-10, and 17-20 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over U.S. Patent No. 6,349,296 (“Broder et al.”) in view of U.S. Patent No. 6,658,423 (“Pugh et al.”) or Applicant admitted prior art (AAPA) and further in view of U.S. Patent No. 6,058,410 (“Sharangpani”) and U.S. Patent No. 5,721,788 (“Powell et al.”). Claims 14-16 and 22 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Broder et al. in view of Powell et al. and further in view of Pugh et al. or AAPA.

### ***Claim Objection***

Claim 1 stands objected to as allegedly not being indented properly. Applicant has amended claim 1 so that it is now properly indented. Accordingly, Applicant respectfully requests that the objection be withdrawn.

### ***Claim Rejections Under 35 U.S.C. § 103(a)***

Claims 1-4, 8-10, and 17-20 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Broder et al. in view of Pugh et al. or Applicant admitted prior art (AAPA) and further in view of Sharangpani. As per claim 1, the rejection is understood to be based on the premise that Broder et al. discloses a method for detecting similar objects in a collection of such objects, the method comprising processing a query to produce the collection of objects and, for each of two objects, modifying a previous method for detecting similar objects. Broder et al. is cited as teaching all of the limitations of claim 1, except for the limitations “...constructing a plurality of hash tables for the collection of objects produced by processing the query,” “...so that memory requirements are reduced while avoiding false detections approximately as well as in the previous method,” “compressing each of the seven

supersamples to sixteen bits of precision,” and “wherein the number of matching supersamples is greater than a number of matching supersamples required in the previous method.” Sharangpani and Pugh et al. are cited as disclosing these limitations.

Applicant respectfully traverses the rejection. Claim 1, as amended, recites the further limitations “constructing a plurality of hash tables storing combinations of the supersamples” and “comparing the supersamples using the hash tables.” By contrast, Pugh et al. discloses at col. 7, lines 49-54, that “the act of generating fingerprints for each document may be effected by (i) extracting parts (e.g., words) from the documents, (ii) hashing each of the extracted parts to determine which of a predetermined number of lists is to be populated with a given part, and (iii) for each of the lists, generating a fingerprint.” That is, in Pugh et al., hashing is used to generate the fingerprints for the documents. As recited in claim 1, on the other hand, the hash tables are used to store combinations of the supersamples for matching. Pugh et al. does not appear to disclose the use of hash tables for this purpose.

For at least these reasons and the reasons discussed in previous papers, Applicant respectfully submits that neither Broder et al., Sharangpani, Pugh et al., not AAPA, whether considered individually or in combination, discloses all of the limitations of claim 1. Thus, claim 1 is patentable over Broder et al. in view of Sharangpani and further in view of Pugh et al. Claims 2-4 and 8-10 depend from claim 1 and are also patentable over Broder et al. in view of Sharangpani and further in view of Pugh et al. at least by reason of this dependency.

Claim 17 has been amended in similar fashion to claim 1 and is also patentable over Broder et al. in view of Pugh et al. or Applicant admitted prior art (AAPA) and further in view of Sharangpani. Claims 18-20 depend from claim 17 and are also patentable over the cited art at least by reason of this dependency.

Claims 14-16 and 22 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Broder et al. in view of Powell et al. and further in view of Pugh et al. or AAPA. Applicant respectfully traverses the rejection. Claims 14 and 22, as amended, recite similar limitations as those discussed above in connection with claim 1. In particular, claims 14 and 22 recite the limitations “constructing fifteen hash tables storing combinations of four supersamples” and “using the hash tables to compare the supersamples” and are patentable at least for the reasons discussed above in connection with claim 1. Accordingly, claims 14 and 22 are patentable over Broder et al. in view of Powell et al. and further in view of Pugh et al.

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Claims 15 and 16 depend from claim 14 and are patentable at least by reason of this dependency.

Based at least on the above remarks, Applicant respectfully submits that the currently pending claims are patentable over the prior art of record and requests reconsideration and removal of the rejections under 35 U.S.C. § 103(a).

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**CONCLUSION**

In view of the above amendments and remarks, Applicant respectfully submits that the present application is in condition for allowance. Reconsideration of the application is respectfully requested.

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/Kenneth R. Eiferman/

Kenneth R. Eiferman

Registration No. 51,647

Woodcock Washburn LLP  
Cira Centre  
2929 Arch Street, 12th Floor  
Philadelphia, PA 19104-2891  
Telephone: (215) 568-3100  
Facsimile: (215) 568-3439